

Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Debtor.

§ Chapter 11
§
§
§ Case No. 19-34054-sgj11
§
§

Defendant.

§
§
§ Adversary Proceeding No.
§
§ No. 20-3190-sgj11
§
§
§
§
§

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

MOTION TO CONTINUE FURTHER THE CONTEMPT HEARING

Highland Capital Management, L.P., the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”) and the debtor and debtor-in-possession (the “Debtor” or “Highland”) in the above-captioned chapter 11 case (“Bankruptcy Case”), by and through its undersigned counsel, files this *Motion to Continue Further the Contempt Hearing* (the “Motion”) requesting that the Court continue the hearing (the “Hearing”) on *Plaintiff’s Motion for an Order Requiring Mr. James Dondero to Show Cause Why He Should Not Be Held in Civil Contempt for Violating the TRO* [Docket No. 48] (the “Contempt Motion”) from February 23, 2021 at 10:00 a.m. (Central Time) [See Docket No. 102] to March 22, 2021 at 9:30 a.m. (Central Time), or as soon thereafter as the Court may determine. In support thereof, the Debtor respectfully represents to the Court as follows:

1. The Debtor respectfully requests that the Court continue the Hearing on the Contempt Motion from February 23, 2021 at 10:00 a.m. (Central Time) to March 22, 2021 at 9:30 a.m. (Central Time), or as soon thereafter as the Court may determine.

2. Given the recent weather conditions and power outages in Texas, as well as the time taken for the Court to consider other matters on February 23, 2021, counsel for the Debtor and counsel for James Dondero have agreed to adjourn the Hearing until March 22, 2021 at 9:30 a.m. (Central Time), or as soon thereafter as the Court may determine.

3. Good cause, therefore, exists to continue the Hearing.

4. This Motion is made in good faith and not for purposes of delay.

WHEREFORE, the Debtor respectfully requests that the Court grant the Motion and grant such other and further relief that is just and necessary.

Dated: March 2, 2021.

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717)

Ira D. Kharasch (CA Bar No. 109084)

John A. Morris (NY Bar No. 266326)

Gregory V. Demo (NY Bar No. 5371992)

Hayley R. Winograd (NY Bar No. 5612569)

10100 Santa Monica Blvd., 13th Floor

Los Angeles, CA 90067

Telephone: (310) 277-6910

Facsimile: (310) 201-0760

Email: jpomerantz@pszjlaw.com

ikharasch@pszjlaw.com

jmorris@pszjlaw.com

gdemo@pszjlaw.com

hwinograd@pszjlaw.com

-and-

HAYWARD PLLC

/s/ Zachery Z. Annable

Melissa S. Hayward

Texas Bar No. 24044908

MHayward@HaywardFirm.com

Zachery Z. Annable

Texas Bar No. 24053075

ZAnnable@HaywardFirm.com

10501 N. Central Expy, Ste. 106

Dallas, Texas 75231

Tel: (972) 755-7100

Fax: (972) 755-7110

Counsel for the Debtor and Debtor-in-Possession